

CRAIG SQUITIERI, ESQ.
Law Offices of Generoso Squitieri
2071 Lemoine Avenue
P.O. Box 1507
Fort Lee, New Jersey 07024-1507
(201) 969-8000, Fax No: (201) 969-8100
Attorney for Debtors

In Re

KEVIN & MARIAN RYAN

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

CHAPTER 13

CASE NUMBER: **03-37974** (MS)

**NOTICE OF MOTION FOR AN ORDER AUTHORIZING THE DEBTORS TO
REFINANCE THEIR REAL PROPERTY**

TO: ALL CREDITORS

Marie-Ann Greenberg
Chapter 13 Standing Trustee
30 Two Bridges Road,
Suite 230 Fairfield, NJ 07004

PLEASE TAKE NOTICE that the Debtors, Kevin & Marian Ryan, by their counsel, will move before the Court on June 16, 2005 at 11:00 a.m. or at a time to be set by the Court for an Order (i) authorizing the Debtors to refinance their real property located at and known as 28 Tulip Street, Bergenfield, New Jersey, in accord with the banks commitment and (ii) such other further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the Debtor will rely upon the application and proposed form of order annexed hereto.

PLEASE TAKE FURTHER NOTICE that the within motion does not require a brief since the matter at issue is not complex.

Dated: May 24, 2004

/s/ Craig Squitieri
CRAIG SQUITIERI
Attorney for Debtors,
Kevin & Marian Ryan